

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

Cuttin' Loose Partners, LLP, )  
Plaintiff, )  
v. )  
Chicago Title Insurance Company, )  
Defendant. )  
Civ. No. 14-\_\_\_\_\_

## NOTICE OF REMOVAL OF ACTION TO FEDERAL COURT

Defendant Chicago Title Insurance Company (“Chicago Title”), (misidentified as “Chicago Title and Insurance Company” in the Amended Summons and Amended Complaint), through its attorney, gives notice to the Plaintiff and to the state court as follows:

1. Chicago Title is a defendant in a civil action now pending in the North Central Judicial District, Ward County, State of North Dakota, entitled Cuttin' Loose Partners, LLP v. Chicago Title and Insurance Company. The Complaint has not been filed by Plaintiff and the court file is not yet opened. Trial has not been held in this case.

2. This action has not been filed in North Dakota state court, and Chicago Title was served with the Amended Summons and Amended Complaint on or about September 2, 2014, but received a copy of the initial Summons and Complaint prior to that time, but not earlier than August 19, 2014, the date of the initial Summons and Complaint.

3. A copy of all process and pleadings (the Summons, Complaint, Amended Summons and Amended Complaint) served on Chicago Title are attached as an exhibit to this Notice of Removal, as required by 28 U.S.C. § 1446(a).

4. This Notice of Removal is filed pursuant to Title 28, United States Code, Section 1332(a), 1441, and 1446. Pursuant to 28 U.S.C. § 1332(a) the federal court has jurisdiction over this matter because the amount in controversy exceeds \$75,000 (exclusive of interest and costs) and is between citizens of different States. The defendant is a Nebraska corporation with its principal place of business in Florida.

WHEREFORE, notice is given that the above-referenced action, Court File Number unassigned, currently pending in the North Central Judicial District, Ward County, North Dakota, is removed from state court into this Court for trial or other such determination as this Court may make regarding the action in accordance with its jurisdictional limits under 28 U.S.C. § 1332(a).

Respectfully submitted,

Dated: September 18, 2014

/s/ Kevin J. Dunlevy  
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**Attorneys for Defendant  
Chicago Title Insurance Company**